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9 **UNITED STATES BANKRUPTCY COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**  
16 **COMPANY,**

17 **Debtors.**

- 18 ☐ Affects PG&E Corporation  
19 ☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

20 *\* All papers shall be filed in the Lead Case, No.*  
21 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON  
RESPONSES TO EIGHTY-EIGHTH  
THROUGH NINETY-SIXTH OMNIBUS  
OBJECTIONS TO CLAIMS AND REQUEST  
FOR ORDERS BY DEFAULT AS TO  
UNOPPOSED OBJECTIONS**

[Re: Dkt. Nos. 10792, 10795, 10799, 10802,  
10805, 10808, 10812, 10815, and 10819]

**Regarding Objections Set for Hearing  
July 28, 2021, at 10:00 a.m. (Pacific Time)**

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PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court enter orders by default on the following omnibus claims objections (collectively, the “**Omnibus Objections**):

Docket Number	Omnibus Objection
10792	<i>Reorganized Debtors’ Eighty-Eighth Omnibus Objection to Claims (Hinkley No Liability Claims)</i> (the “ <b>Eighty-Eighth Omnibus Objection</b> ”)
10795	<i>Reorganized Debtors’ Eighty-Ninth Omnibus Objection to Claims (Books and Records Claims)</i> (the “ <b>Eighty-Ninth Omnibus Objection</b> ”)
10799	<i>Reorganized Debtors’ Ninetieth Omnibus Objection to Claims (No Liability Claims)</i> (the “ <b>Ninetieth Omnibus Objection</b> ”)
10802	<i>Reorganized Debtors’ Ninety-First Omnibus Objection to Claims (Customer No Liability Energy Rate Claims)</i> (the “ <b>Ninety-First Omnibus Objection</b> ”)
10805	<i>Reorganized Debtors’ Ninety-Second Omnibus Objection to Claims (Satisfied Claims)</i> (the “ <b>Ninety-Second Omnibus Objection</b> ”)
10808	<i>Reorganized Debtors’ Ninety-Third Omnibus Objection to Claims (No Legal Liability Claims)</i> (the “ <b>Ninety-Third Omnibus Objection</b> ”)
10812	<i>Reorganized Debtors’ Ninety-Fourth Omnibus Objection to Claims (Amended and Superseded Claims)</i> (the “ <b>Ninety-Fourth Omnibus Objection</b> ”)
10815	<i>Reorganized Debtors’ Ninety-Fifth Omnibus Objection to Claims (Plan Passthrough Claims)</i> (the “ <b>Ninety-Fifth Omnibus Objection</b> ”)
10819	<i>Reorganized Debtors’ Ninety-Sixth Omnibus Objection to Claims (Customer No Liability / Passthrough Claims)</i> (the “ <b>Ninety-Sixth Omnibus Objection</b> ”)

## RELIEF REQUESTED IN THE OMNIBUS OBJECTIONS

The Omnibus Objections seek to either (a) disallow and/or expunge or (b) allow in reduced amounts the Proofs of Claim listed in Exhibit 1 to each Omnibus Objection.

**NOTICE AND SERVICE**

The Reorganized Debtors filed a Notice of Hearing with respect to each Omnibus Objection [Docket Nos. 10794, 10798, 10801, 10804, 10807, 10811, 10814, 10818, and 10821]. The Omnibus Objections also were supported by the respective declarations of Robb McWilliams [Docket Nos. 10796, 10800, 10803, 10806, 10813, and 10820], Matthew Dudley [Docket No. 10793], A. Anna Capelle [Docket No. 10809], Stacy Campos [Docket No. 10810], Stephen George [Docket No. 10816], and David Kraska [Docket No. 10817]. The Omnibus Objections, the Notices of Hearing, and the Declarations were served as described in the *Certificate of Service of Alain B. Francoeur*, filed on June 28, 2021 [Docket No. 10867], each holder of a claim listed on Exhibit 1 to the Omnibus Objections received a notice customized to include (i) the claim number, debtor, claim amount and priority, and the basis for Reorganized Debtors' objection with respect to the applicable claim to be disallowed and/or expunged or allowed in a reduced amount, and, if applicable (ii) the claim number, claim amount and priority of the surviving claim for each counterparty.

The deadline to file responses or oppositions to the Omnibus Objections has passed. The Reorganized Debtors have received the following formal and informal responses:

Docket No.	Claimant	Claim No.	Resolution
<b>Ninety-Third Omnibus Objection</b>			
10907	Duivenvoorden, Marcus	75903	The Reorganized Debtors will seek to resolve the Claim through the Court-approved ADR procedures, and request that the hearing on the Claim be taken off calendar and continued indefinitely in the interim.
10919	Chappell, Lamont	9946	This matter is going forward contested at the July 28, 2021 Omnibus Hearing.
10918	California Department of Housing and Community Development	56868	This matter has been continued to the September 14, 2021 Omnibus Hearing.
Informal	City of San Carlos	68838	This matter has been continued to the August 10, 2021 Omnibus Hearing.

Docket No.	Claimant	Claim No.	Resolution
10946	Richards, Darwin	86933 96962	This matter is going forward contested at the July 28, 2021 Omnibus Hearing.
<b>Ninety-Fourth Omnibus Objection</b>			
10895	Asplundh Construction, LLC	17001	The Claimant filed a statement of no opposition. The Ninety-Fourth Omnibus Objection is SUSTAINED with respect to this claim.

### **DECLARATION OF NO OPPOSITION RECEIVED**

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors.

2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no responses have been filed with respect to the Omnibus Objections except as described herein.

3. This declaration was executed in Sunnyvale, California.

WHEREFORE, the Reorganized Debtors hereby request entry of Orders disallowing and/or expunging the Proofs of Claim listed in **Exhibit 1**<sup>1</sup> to this Request, which listed Claims are identical to those listed in Exhibit 1 to the Omnibus Objections, except as otherwise discussed above.

Dated: July 21, 2021

**KELLER BENVENUTTI KIM LLP**

By: /s/ Thomas B. Rupp  
Thomas B. Rupp

*Attorneys for Debtors and Reorganized Debtors*

<sup>1</sup> The portions of **Exhibit 1** listing Claims to be expunged pursuant to the Eighty-Ninth Omnibus Objection, Ninety-Third Omnibus Objection, and Ninety-Fifth Omnibus Objection have been redacted in accordance with the *Order Granting Motion to Redact Documents Filed in Support of Reorganized Debtors' Omnibus Objections to Claims*, entered on June 21, 2021 [Docket No. 10832]. Unredacted versions for the Court's review will be filed under seal.